

# **EXHIBIT A**

## **STIPULATION AND ORDER TO DISMISSES THE COLLECTION ACTION**

**EXHIBIT A**

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12 Company*

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA**

10 OHIO SECURITY INSURANCE COMPANY, Case No.: A-18-785518C

11 Plaintiff, Dept. No.: 11

13 ALLEGIANT INSTITUTE INC., a Nevada  
14 corporation; and JOHN DOES I through X,  
inclusive.

15 Defendants.

Case No.: A-18-785518C

Dept. No.: 11

**STIPULATION AND ORDER TO  
DISMISS THE COLLECTION ACTION  
WITHOUT PREJUDICE; EXTENTION  
OF TIME FOR PLAINTIFF TO  
RESPOND TO COUNTER-CLAIM;  
AND MODIFY THE CAPTION TO  
REFLECT THE CORRECT PARTIES**

17 ALLEGIANT INSTITUTE INC., f/k/a Dr.  
18 Jaswinder Grover MD LTD., A Nevada  
corporation.

**Counter-Claimant.**

21 v

22 OHIO SECURITY INSURANCE COMPANY,  
23 A foreign limited liability company, LIBERTY  
24 MUTUAL INSURANCE COMPANY; DOES I  
- V and ROES I - V, inclusive,

### Counter-Defendants.

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1       The parties, by and through their respective counsel of record, hereby stipulate and agree to the  
2 following:

3       (1) That the causes of action/complaint by Plaintiff OHIO SECURITY INSURANCE  
4 COMPANY against Defendant ALLEGIANT INSTITUTE INC., f/k/a Dr. Jaswinder  
5 Grover MD LTD be dismissed without prejudice;  
6       (2) That the counter-claim by Defendant/Counter-claimant ALLEGIANT INSTITUTE INC.,  
7 f/k/a Dr. Jaswinder Grover MD LTD., is not dismissed and will remain. The counter-claim  
8 will now be the operative complaint;  
9       (3) That the parties, in light of these changes, hereby stipulate to amend the case caption to  
10 reflect the changes in party position. A copy of the joint proposed amended case caption is  
11 attached to this Stipulation as **Ex. A.**; and  
12       (4) That the deadline for Defendants OHIO SECURITY INSURANCE COMPANY and  
13 LIBERTY MUTUAL INSURANCE COMPANY to respond to the counter-claim (now  
14 "Complaint") shall be March 12, 2019.

15       Dated: February 12, 2019

16       JESSE SBAIH & ASSOCIATES, LTD.  
17       By: Jesse M. Sbaih  
18       Jesse M. Sbaih  
19       Ines Olevic-Saleh  
20       170 S. Green Valley Parkway, Suite 280  
21       Henderson, NV 89012

22       *Attorneys for Defendant/Counterclaimant*  
23       *Allegiant Institute, Inc./f/k/a Dr. Jaswinder*  
24       *Grover MTD LTD*

15       Dated: February 13, 2019

16       FORAN GLENNON PALANDECH PONZI  
17       & RUDLOFF PC  
18       By: Amy M. Samberg  
19       Amy M. Samberg  
20       Dylan P. Todd  
21       2200 Paseo Verde Parkway, Suite 280  
22       Henderson, NV 89052

23       *Attorneys for Ohio Security Insurance*  
24       *Company and Liberty Mutual Insurance*  
25       *Company*

## ORDER

## IT IS SO ORDERED.

DATED: February 14, 2019

Eugene B. Flanagan  
DISTRICT COURT JUDGE

FORAN GLENNON PALANDECH PONZI & RUDLOFF PC  
2160 Parco Verde, Suite 150  
Henderson, Nevada 89052  
702-821-1510

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing **STIPULATION AND ORDER TO DISMISS THE COLLECTION ACTION WITHOUT PREJUDICE; EXTENTION OF TIME FOR PLAINTIFF TO RESPOND TO COUNTER-CLAIM; AND MODIFY THE CAPTION TO REFLECT THE CORRECT PARTIE** was served by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Jesse Sbiah & Associates, Ltd.  
Jesse M. Sbiah  
Ines Olevic-Seleh  
The District at Green Valley Ranch  
170 South Green Valley Parkway  
Suite 280  
Henderson, NV 89012

Attorneys for Defendant/Counter-  
Claimant Allegiant Institute Inc., /s/k/a  
Dr. Jaswinder Grover MD LTD

Dated: February 15, 2019.

Rita Steele  
An Employee of Foran Glennon